

1 Diana G. Dickinson, Esq.
2 Nevada Bar No. 13477
3 Littler Mendelson, P.C.
4 3960 Howard Hughes Parkway
5 Suite 300
6 Las Vegas, NV 89169-5937
7 Telephone: 702.862.8800
8 Fax No.: 702.862.8811
9 ddickinson@littler.com

10 Attorney for Defendant
11 BACKGROUNDCHECKS.COM LLC

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Melvin Washington,
Plaintiff,

v.

National Consumer Telecom & Utilities
Exchange, Inc.; Innovis Data Solutions, Inc.;
Clarity Services, Inc. and
Backgroundchecks.com LLC,
Defendants.

Case No. 2:24-cv-01618-JAD-DJA

JOINT MOTION

**~~STIPULATION~~ TO EXTEND TIME FOR
DEFENDANT
BACKGROUNDCHECKS.COM LLC TO
FILE RESPONSIVE PLEADING TO
PLAINTIFF'S COMPLAINT**

[FIRST REQUEST]

Plaintiff MELVIN WASHINGTON ("Plaintiff") and Defendant
BACKGROUNDCHECKS.COM LLC ("Defendant"), by and through their undersigned counsel,
hereby agree and stipulate to extend the time for Defendant to file a response to the Complaint from
the current deadline of November 4, 2024, up to and including **December 4, 2024**.

The requested extension is necessary in light of the fact the parties have begun discussions
regarding the scope and handling of the case and potential resolution of this matter. The additional
time will allow the parties to complete these discussions for efficiency before having to engage in
motion practice.

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1 This is the first request for an extension of time to respond to the Complaint. This request is
2 made in good faith and not for the purpose of delay.

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4 Dated: October 25, 2024

Dated: October 25, 2024

5 Respectfully submitted,

Respectfully submitted,

6
7 /s/ Gerardo Avalos
George Haines, Esq.
Gerardo Avalos, Esq
8 FREEDOM LAW FIRM, LLC

/s/ Diana G. Dickinson
Diana G. Dickinson, Esq.
LITTLER MENDELSON, P.C.

9 *Attorneys for Plaintiff*
10 GWENDOLYN WASHINGTON

Attorney for Defendant
BACKGROUNDCHECKS.COM LLC

11 **ORDER**

12 Under Local Rule 7-1(c), a stipulation that has been signed by fewer than all the parties or their
13 attorneys will be treated - and must be filed - as a joint motion. The Court thus treats this filing as a
14 joint motion and will expect that future filings follow Local Rule 7-1(c). The Court GRANTS the
joint motion (ECF No. 13).

15 DATED: 10/28/2024

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DANIEL J. ALBRECHTS
19 UNITED STATES MAGISTRATE JUDGE
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